

# EXHIBIT D

**In the Matter Of:**

*Haran vs*

*Orange Business Services Inc.*

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*PATRICIA HARAN*

*April 26, 2023*

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4 P A T R I C I A H A R A N,  
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6 having been first duly sworn by a Notary  
7 Public of the State of New York was examined and  
8 testified herein:  
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1 P. HARAN

2 during your employment of Level 3 or

3 Lumen?

4 A. No.

5 Q. When were you hired by Orange

6 Business Services -- and just for the

7 record, I'm going to be referring to

8 Orange Business Services NA, Inc. as

9 Orange or OBS throughout the deposition;

10 is that okay?

11 A. Yes.

12 Q. So when were you hired by

13 Orange?

14 A. I was hired -- I believe it

15 was May of 2017.

16 Q. And what was the position for

17 which you were hired?

18 A. Account manager.

19 Q. Does it have a specific title

20 at Orange?

21 A. I believe it was account

22 manager --

23 Q. Okay.

24 A. -- was the technical title.

25 Q. Do you recall if you signed

26

1 P. HARAN

2 2017?

3 A. Yes.

4 Q. Did you always have the same  
5 role throughout your entire tenure at  
6 Orange?

7 A. Yes.

8 Q. So you never changed roles?

9 A. No. As far as titles, you  
10 know, if that's what you mean -- titles  
11 is -- has -- did not change.

12 Q. Did your responsibilities  
13 change at any time while at Orange?

14 A. Just accounts that I was  
15 working on would have changed.

16 Q. When did that change?

17 A. Probably several times over my  
18 tenure there. You know, just sort of  
19 like somebody resigned, so we need you  
20 to take on these accounts, and also work  
21 on your other accounts, we're going to  
22 move that account to somebody else, that  
23 kind of thing.

24 Q. Did there ever come a time  
25 where you started taking on more

1 P. HARAN

2 responsibilities for A-end accounts?

3 A. Yeah. Yeah. That was part  
4 of -- somebody left, somebody resigned.

5 And I was asked to handle some of her  
6 A-end accounts during -- because she had  
7 left the company.

8 Q. So that's not something that  
9 you requested to take on?

10 A. Well, at that time it was  
11 brought to me. I mean, over the years I  
12 had spoken about the potential of  
13 working on A-end accounts, yes, but  
14 these particular accounts, you know, I  
15 was asked to work on them because the  
16 person who had them had resigned from  
17 the company.

18 Q. Do you recall about when that  
19 was?

20 A. I recall not exactly sure, but  
21 I want to say it was in the January  
22 of 20 -- I guess it would have been  
23 January of 2020 timeframe, I believe.

24 Q. And who is the person that  
25 left that you're referring to?

1 P. HARAN

2 A. Lorna Paine.

3 Q. I'm going to show you the  
4 documenter. Mark this as Haran 2.

5 (Whereupon, Bates OBS13 was marked as  
6 Exhibit 2 for identification, as of  
7 April 26th, 2023.)

8 MR. GUILFOYLE: For the  
9 record, this is a one-page document  
10 bearing Bates OBS 13.

11 Q. Ms. Haran, do you recognize  
12 this document?

13 A. Vaguely, I recognize it. I  
14 mean, it says Employee Handbook  
15 acknowledgment for the United States.  
16 So, I mean, I think there was a big pile  
17 of paper that I signed when I went on  
18 board and I'm sure this was one of them.  
19 I don't specifically recall it, but it's  
20 my signature.

21 Q. Okay. That's dated May 11,  
22 2017?

23 A. Yes.

24 Q. I'm going to show you another  
25 document that will be marked as Haran 3.

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1 P. HARAN

2 (Whereupon, a document was marked as  
3 Exhibit 3 for identification, as of  
4 April 26th, 2023.)

5 Q. And do you recognize this  
6 document as one of those documents you  
7 mentioned that you signed when you were  
8 onboarding?

9 A. I don't recognize it in  
10 particular, but it is my signature and  
11 like I said there was a big pile of  
12 papers that I was asked to sign when I  
13 was onboarded.

14 Q. Okay. That signature is dated  
15 May 18, 2017?

16 A. Yes.

17 Q. Who did you report to during  
18 your employment with Orange?

19 A. I reported to Adam Kimmick.

20 Q. Do you know Adam Kimmick's  
21 title?

22 A. Sales director. Head of  
23 sales, I think. I'm not sure.

24 Q. Okay. What.

25 (Simultaneous speaking.)

30

1 P. HARAN

2 A. Sales director.

3 Q. Was that for a specific region  
4 of the United States?

5 A. He was responsible for the  
6 northeast and the midwest regions.

7 Q. Did you report to anyone else?

8 A. No.

9 Q. During your employment at  
10 Orange, did you receive performance  
11 evaluations?

12 A. Yes.

13 Q. Did you meet with anyone to  
14 discuss those performance evaluations?

15 A. Yes.

16 Q. And who was that?

17 A. Adam Kimmick.

18 Q. Anyone else?

19 A. No.

20 Q. I'm going to show you a  
21 document that will be marked as Haran 4.

22 (Whereupon, BATES OBS334 - 343 was  
23 marked as Exhibit 4 for identification,  
24 as of April 26th, 2023.)

25 MR. GUILFOYLE: And for the

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1 P. HARAN

2 record this is a document bearing Bates

3 OBS334 through 343.

4 Q. Ms. Haran, do you recognize  
5 this document?

6 A. Let me just take a look here.

7 Q. Take your time.

8 A. Okay.

9 Q. Okay. And do you recognize  
10 this document?

11 A. I do.

12 Q. And what is this document?

13 A. A performance review.

14 Q. And is this for the first half  
15 of 2020?

16 A. Yes. It appears to be.

17 Q. Do you know who created this  
18 performance review?

19 A. It was created by Adam Kimmick  
20 and myself.

21 Q. Okay. And if I could just  
22 bring your attention --

23 A. I mean it was filled in, I  
24 would say, by us. It wasn't created by  
25 us. It was created by a company, I

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1 P. HARAN

2 assume. It's a performance review plan  
3 that I think everybody fills in, but it  
4 was populated by myself and Adam.

5 Q. So the templates for the  
6 performance review was created by  
7 Orange?

8 A. Correct.

9 Q. And then the contents of what  
10 went in there specific to you were  
11 inputted by Adam and yourself?

12 A. Correct, yes.

13 Q. Okay. If I can bring your  
14 attention to page 8 of 10, if you look  
15 on the lower right corner.

16 A. Lower right corner.

17 Q. Yes, so now if I bring your  
18 attention to where it says manager's  
19 comments, do you see that at the top of  
20 the page?

21 A. Yes.

22 Q. Okay. Could you read the  
23 first two sentences under manager's  
24 comments for me?

25 A. Yes. "First half 2020 was a

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1 P. HARAN  
2 challenge for Patty in her new  
3 territory. Results on revenue were in  
4 line with the expectations that fell  
5 short of target in both keep and new and  
6 get orders."

7 Q. What is the next sentence  
8 there?

9 A. "Her qualified pipeline is not  
10 currently sufficient to meet her 2020  
11 financial objectives, and the new  
12 opportunities created in 2019 with her  
13 B-end accounts exploring partnership and  
14 sell with opportunities to expand our  
15 portfolio, have not yet matured as ample  
16 opportunities."

17 Q. Okay. What does it mean that  
18 your qualified pipe library is not  
19 currently sufficient to meet 2020  
20 financial objectives?

21 A. Well, I mean I'd be  
22 speculating on what Adam means there; is  
23 that what would you like for me to do?

24 Q. Sure. What is your  
25 understanding of what that means?

1 P. HARAN

2 A. My understanding is that  
3 pipeline is a sales forecast and  
4 typically sales forecasts, you know, are  
5 larger than what the quota is that's  
6 assigned. And so when he's saying that  
7 he thinks that my pipeline is not, you  
8 know, his words here, my pipeline is not  
9 sufficient, then he doesn't feel that I  
10 have enough opportunities in my sales  
11 forecast to meet my target quota for  
12 2020.

13 Q. If we could turn to the next  
14 page, please?

15 (Witness complies.)

16 Q. And do you see where it says  
17 acknowledgment by the employee the 30th  
18 of July 2020?

19 A. Yes.

20 Q. Okay. Do you recall having  
21 completed the performance review on or  
22 about July 30, 2020?

23 A. Yes.

24 Q. And is that typical for  
25 first-half performance reviews to be

35

1 P. HARAN

2 done towards the end of July, in your  
3 experience?

4 A. I don't know. I'd have to --  
5 you know, I really don't know. I mean  
6 typically they'd be done somewhere  
7 around the end of the first half, so it  
8 seems a little late, but that's just,  
9 you know, it's probably -- it's  
10 probably, you know, it could be done  
11 earlier in June or something, so, but,  
12 you know, it's not -- it seems to be at  
13 the end of July, so.

14 Q. Okay. I'm going to show you  
15 another document.

16 MR. GUILFOYLE: For the  
17 record, this will be Haran 5.

18 (Whereupon, BATES OBS344 - 353 was  
19 marked as Exhibit 5 for identification,  
20 as of April 26th, 2023.)

21 Q. I just ask that you take a  
22 moment and look through that document,  
23 please.

24 MR. GUILFOYLE: For the  
25 record, it's OBS344 through 353.

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1 P. HARAN

2 Q. Do you recognize this  
3 document?

4 A. Yes.

5 Q. What do you recognize it to  
6 be?

7 A. A performance review.

8 Q. Do you know who input the  
9 substance of text within this review?

10 A. Yes.

11 Q. Who was that?

12 A. Adam Kimmick and myself.

13 Q. If I could bring your  
14 attention to the page identified by nine  
15 out of ten. Can you tell me what the  
16 overall rating is there?

17 A. Yes. The rating is two,  
18 improvement needed.

19 Q. Okay. And with the evaluation  
20 process at Orange, you were given the  
21 opportunity to respond to your manager's  
22 comments and conclusions in here, right?

23 A. Correct.

24 Q. Okay. And it looks like you  
25 did so below the manager's comments here

1 P. HARAN

2 on this page?

3 A. Yes.

4 Q. Okay. Did you note anywhere  
5 in this performance review that you  
6 believed your improvement needed rating  
7 was due to you having taken time off in  
8 connection with your daughter's or your  
9 mother's illness?

10 A. Could you repeat the question?

11 Q. Sure.

12 MR. GUILFOYLE: Could you read  
13 that back for me?

14 (Whereupon, the requested portion was  
15 read back by the reporter.)

16 A. No, it's -- I don't see that  
17 in here.

18 BY MR. GUILFOYLE:

19 Q. Do you see anything on this  
20 page about your lack of focus?

21 A. There's just a comment that  
22 says, "urgent focus, it needs to be on  
23 identifying new opportunities and moving  
24 these progressively through the  
25 pipeline." It's the last sentence.

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1 P. HARAN

2 A. It was -- we did discuss it,  
3 yes. I brought it up to him and said  
4 you know again like I've mentioned in my  
5 earlier statement, you know, I was  
6 dealing with the -- my mother -- my  
7 daughter's illness. I was dealing with  
8 all of the events that were preceding  
9 that and that it was difficult for me  
10 to, you know, juggle that along with  
11 everything else that my responsibilities  
12 were for the job.

13 MR. GUILFOYLE: Okay. I'm  
14 going to move to strike the nonresponsive  
15 answer.

16 Q. The question was: Did  
17 Mr. Kimmick say anything about you  
18 taking time off in connection with your  
19 daughter's or mother's illness; not if  
20 you said anything?

21 A. He did not bring it up, but he  
22 responded to my bringing it up, did  
23 that --

24 Q. Makes sense?

25 A. Makes sense.

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1 P. HARAN

2 Q. So what makes you think that  
3 your two rating here has anything to do  
4 with the days you take off in connection  
5 with your daughter's illness in October?

6 A. Well, the focus commentary  
7 that we had, and in the conversation  
8 that the lack of focus was his  
9 assessment around why he thought that I  
10 was not able to -- to meet the objective  
11 in this -- in this overall rating.

12 Q. And do you believe you had  
13 a -- you did indeed have a lack of focus  
14 during this time?

15 A. Yeah, I mean, it was something  
16 that was -- it was something that I was  
17 trying to work through, and, you know,  
18 balance as best as I could to do the  
19 right thing for the company, to do the  
20 right thing to advance all of my sales,  
21 and also, you know, manage my daughter's  
22 illness and all -- everything that was  
23 associated with that, so yeah.

24 Q. Let me show you another  
25 document.

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1 P. HARAN

2 Q. What do you recognize it to  
3 be?

4 A. I actually -- I mean, I  
5 recognize it now. I hadn't -- it's been  
6 a while since, you know, I wrote this,  
7 so I recognize it to be a correspondence  
8 between Michelle Rocco and myself.

9 Q. Okay. And in these emails did  
10 you request any sort of leave for any  
11 time off from Michelle Rocco?

12 A. No.

13 Q. Okay. How did you come to  
14 learn that your employment at Orange had  
15 been terminated?

16 A. I was invited to a call, I  
17 believe it might have even been my  
18 weekly -- I don't know, it was a call  
19 that I was invited to by Adam Kimmick,  
20 WebEx.

21 Q. A virtual meeting type thing?

22 A. Yes.

23 Q. And do you recall when that  
24 was?

25 A. It was -- I believe, it was

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1 P. HARAN

2 February 24, 2021.

3 Q. And do you know where Adam was  
4 during this meeting?

5 A. Physically?

6 Q. Yes.

7 A. I don't recall.

8 Q. Okay. Was anyone else present  
9 at this meeting?

10 A. Yes.

11 Q. Who was that?

12 A. Jennifer Lawson.

13 Q. And who is Jennifer Lawson?

14 A. She's a human resources  
15 manager or associate. I don't know her  
16 title exactly.

17 Q. And did they provide a reason  
18 for your termination during that  
19 meeting?

20 A. There were two reasons  
21 provided.

22 Q. And what were those two  
23 reasons?

24 A. The reason number one, I  
25 believe it was Adam who said -- well,

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1 P. HARAN

2 Jennifer first said, as I recall, when I  
3 asked her why I was terminated, she said  
4 it was because you didn't make your 2020  
5 quota or something along those lines.  
6 Don't quote me exactly, but it was that  
7 I didn't -- maybe it was my sales  
8 achievement I don't know how she said  
9 it, but it was my 2020 quota. And then  
10 Adam jumped in and said no, it's because  
11 you don't have an adequate forecast for  
12 2021. But as I had mentioned earlier I  
13 did not get a quota, and I said this to  
14 him in that conversation, I was never  
15 given a quota for 2021.

16 Q. Okay. And I believe you had  
17 testified before that you only reported  
18 to Adam Kimmick; is that correct?

19 A. Correct.

20 Q. And Ms. Lawson was not your  
21 supervisor, correct?

22 A. Correct.

23 Q. Do you know who made the  
24 decision to terminate your employment  
25 from Orange?

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1 P. HARAN

2 A. I could speculate, but I don't  
3 know if that makes sense to guess, you  
4 know, I mean -- I -- I'm not a hundred  
5 percent sure who made the decision, but  
6 I believe it was Adam Kimmick who made  
7 the decision.

8 And I believe that he -- Eddy  
9 Youkhanna was also part of that decision  
10 process. He was a sales director that  
11 Adam reported to.

12 Q. Okay. So he was one level  
13 higher than Mr. Kimmick?

14 A. Correct.

15 Q. All right. I'm going to show  
16 you a document that will be marked as  
17 Haran 9.

18 (Whereupon, Bates OBS381 - 383 was  
19 marked as Exhibit 9 for identification,  
20 as of April 26th, 2023.)

21 MR. GUILFOYLE: And for the  
22 record, this is a document bearing Bates  
23 OBS381 through 383.

24 Q. And Ms. Haran, I just ask that  
25 you take a moment and review this

1 P. HARAN

2 document.

3 A. Okay.

4 Q. Do you recognize this  
5 document?

6 A. Yes.

7 Q. What do you recognize it to  
8 be?

9 A. It's a termination letter that  
10 I received after -- after I was  
11 terminated.

12 Q. Do you recall on what date you  
13 received this letter?

14 A. I do not recall exactly what  
15 date. It was -- it has the 24th in the  
16 letter. I don't know if that's what --  
17 it was emailed to me. I don't remember  
18 the day that it was emailed to me.

19 Q. And did you receive this  
20 letter after your meeting with  
21 Mr. Kimmick and Ms. Lawson?

22 A. Yes.

23 Q. Prior to your termination, did  
24 you ever feel that your employment could  
25 be in jeopardy because of your

1 P. HARAN

2 performance?

3 A. Yes.

4 Q. Okay. Did you discuss that  
5 with anyone?

6 A. Yes.

7 Q. Who did you discuss that with?

8 A. Well, the question is who did  
9 I discuss the concerns that I had about  
10 it being in jeopardy about my  
11 employment?

12 Q. Because of your performance.

13 A. Because of my performance.

14 Well, I mean, when we say it  
15 was because of my performance, it was  
16 also because of the time off, you know,  
17 that I was taking and the lack of focus,  
18 and the perception that was there. So  
19 it wasn't just one thing, you know, it  
20 was -- but performance was part of that.  
21 So I just want to be careful about how  
22 to answer that so that -- because  
23 usually it was like a combined  
24 conversation. It was sort of like, Hey,  
25 the performance is, you know, always an

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1 P. HARAN

2 I talked to Marie-Cecile  
3 Deraedt about it. I talked to Paul  
4 Reticker about it. I talked to Phillip  
5 Melegrito did about it, and I talked to  
6 M.J. Hubert about it.

7 Q. Let me show you a document  
8 that's going to be marked as Haran 10.

9 (Whereupon, a document was marked as  
10 Exhibit 10 for identification, as of  
11 April 26th, 2023.)

12 A. Okay.

13 Q. Do you recognize this  
14 document?

15 A. I -- yeah, I mean, it's --  
16 I've not seen it before, so -- but I  
17 recognize, you know, the -- that it's --  
18 looks like a Teams chat.

19 Q. Okay. Who is that Teams chat  
20 between?

21 A. Myself and Peter Singh.

22 Q. Your email address while at  
23 Orange was Patty.Haran@Orange.com?

24 A. Yes.

25 Q. Prior to your termination from

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1 P. HARAN

2 MR. GUILFOYLE: I'm going to  
3 show you what'll be marked as Haran 11.

4 For the record, it's a document  
5 bearing Bates OBS926 through 927.

6 (Whereupon, Bates OBS926 - 927 was  
7 marked as Exhibit 11 for identification,  
8 as of April 26th, 2023.)

9 Q. I just ask that you take a  
10 moment and review that document for me.

11 A. Okay.

12 Q. Do you recognize this  
13 document?

14 A. I have not seen this document  
15 before, but it appears to be a -- a  
16 Teams chat, again, between Peter Singh  
17 and myself.

18 Q. And it appears that these were  
19 dated February 10, 2021; is that  
20 correct?

21 A. Yes.

22 Q. Following being notified of  
23 your termination from Orange, did you  
24 speak about that termination with any  
25 Orange employees?

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1 P. HARAN

2 Q. I'll show you what will be  
3 marked as Haran 12.

4 (Whereupon, Bates OBS930 - 931 was  
5 marked as Exhibit 12 for identification,  
6 as of April 26th, 2023.)

7 MR. GUILFOYLE: For the  
8 record, it's a two-page document bearing  
9 Bates OBS930 through 931.

10 A. Yes.

11 Q. I just ask that you take a  
12 moment and review that document and let  
13 me know when you've had the opportunity  
14 to do so.

15 A. Okay.

16 Q. Do you recognize this  
17 document?

18 A. This is the first time I'm  
19 seeing this document, but it looks like  
20 a text exchange that were a Teams  
21 exchange I believe between Xavier Pichon  
22 and myself.

23 Q. Okay. And who is Xavier  
24 Pichon?

25 A. Global account director at

1 P. HARAN

2 inability to attend a training that he  
3 had wanted me to be apart of. So he was  
4 aware of my daughter's condition, and he  
5 was aware of, you know, the time off  
6 that I needed to care for her.

7 Q. And when did you have that  
8 conversation with Mr. Youkhanna?

9 A. So I had a -- I don't remember  
10 the exact date of the conversation, but  
11 it was at some point in between --  
12 between September and October before her  
13 surgery.

14 Q. And when was your daughter  
15 diagnosed with her illness?

16 A. Well, the diagnosis exact  
17 date, I don't recall, but it was  
18 somewhere in the late-September,  
19 early-October timeframe. And it was in  
20 a series of discoveries, the diagnosis.  
21 It was several different appointments  
22 and things, you know, where we got bits  
23 of information that added to the  
24 diagnosis.

25 Q. And that was in 2020?

1 P. HARAN

2 A. Correct.

3 Q. And who is Peter Singh?

4 A. He's a technical director at  
5 Orange.

6 Q. Okay. And what information do  
7 you believe Mr. Singh has with regard to  
8 your complaint?

9 A. So, he was aware of the  
10 increased pressure and stress and  
11 scrutiny that I was under about  
12 developing my quota and making my  
13 numbers. He was aware of -- that -- my  
14 daughter's illness, and that -- my  
15 belief that there was a connection and  
16 that that was something that was, you  
17 know, causing the increased pressure.  
18 So, yeah, he was aware of all that.

19 Q. Okay. When did you have these  
20 conversations with Mr. Singh?

21 A. So, we had the Teams  
22 conversations. We also met in person  
23 in -- in February. I don't know the  
24 exact date, but it was some time in  
25 February. We had coffee in New York

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1 P. HARAN

2 more quickly through the funnel and  
3 close things, you know that coincided  
4 with my daughter's, you know, medical  
5 activities.

6 Q. Why do you believe the  
7 increased pressure that you've mentioned  
8 a few times regarding getting sales  
9 closed and moving sales quickly, had  
10 anything to do with your daughter's  
11 condition?

12 A. So, Adam felt that, as I  
13 mentioned to you earlier, that I lacked  
14 focus and so he'd think -- he thought --  
15 his commentary was around the fact that  
16 I wasn't as focused on developing, you  
17 know, these accounts more quickly, and  
18 that I could take off if I needed to  
19 take off, but I needed to get this --  
20 sales completed. And so, you know, it  
21 was just a real lack of -- a lack of,  
22 you know, it was kind of just cold and,  
23 you know, and unsympathetic like, you  
24 know, you've got to get this done.

25 And, you know, I don't

1 P. HARAN  
2 really -- it was like stonewalling, you  
3 know, any time I talked about, you know,  
4 needing time off. It was kind of like,  
5 I don't want to hear about that, I just  
6 want you to close these sales. And so  
7 that's why -- that was the situation  
8 that I was experiencing.

9 Q. Okay. Did you believe that  
10 your performance expectation should be  
11 changed as a result of you needing to  
12 take time off to care for your daughter?

13 A. Did I believe that? I thought  
14 that I should be -- yeah, I mean given  
15 some accommodation to account for, you  
16 know, what I was -- what I -- trying to  
17 juggle it all. But it was also -- I  
18 think that, you know, the expectations  
19 were -- the expectations there were --  
20 were heightened, you know, during the --  
21 all of the episodes around my daughter's  
22 condition. It was kind of like, you  
23 know, it changed at that time and became  
24 more, you know, focused and more, you  
25 know, persistent around, you know, the

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1 P. HARAN

2 need for me to close those sales.

3 Q. Did those expectations  
4 actually change because of your  
5 daughter's illness? I'm just trying to  
6 understand.

7 MS. FISHER: Objection.

8 BY MR. GUILFOYLE:

9 Q. You can answer.

10 A. I -- you know, it's hard to  
11 speculate on what, you know, whether or  
12 not -- I just know that it was like, you  
13 know --

14 Q. I'm not asking you to  
15 speculate, I'm only asking what you  
16 know.

17 A. Make sure I understand, repeat  
18 the question again.

19 Q. Sure. You had mentioned that  
20 you believed expectations changed, and I  
21 was asking if you were ever informed  
22 that your sales or quota or your numbers  
23 changed at any point in 2020?

24 A. No, my numbers didn't --  
25 weren't changed in 2020.

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2 know, it was -- I don't know the all the  
3 exact times of the conversations, but I  
4 would say for the most part, yes.

5 Q. All right. And in this  
6 lawsuit you have a claim of FMLA  
7 interference, how do you contend that  
8 Orange interfered with your FMLA rights?

9 A. So, I believe that when I took  
10 the time off to care for my mother and  
11 my daughter, that that time should have  
12 been counted as FMLA. It should have  
13 been offered to me as an option at that  
14 time and it was not, and it was held  
15 against me and, you know, then I was  
16 retaliated against by being terminated.

17 Q. Is that all the ways that you  
18 believe Orange interfered with your FMLA  
19 rights?

20 A. Yeah, I believe so.

21 Q. Did Orange prohibit you from  
22 taking any time off for your daughter's  
23 procedure and recovery?

24 A. No.

25 Q. Okay. For the days you took

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2 off, you used paid time off or PTO; is  
3 that right?

4 A. Yeah, sometimes and then  
5 sometimes it was just, Just go do what  
6 you need to do, you know. So, it was  
7 sometimes half days and partial days and  
8 things like that. Because I was trying  
9 to, you know, juggle it all.

10 Q. You were paid for those days  
11 that you took off or the half days you  
12 took off as well?

13 A. Yeah, the system doesn't -- I  
14 don't think has a way to pay for half  
15 days.

16 Q. So you were --

17 A. It was salary not hourly.

18 Q. So for all the days you took  
19 off, you were paid for those days?

20 A. Yes.

21 Q. Did Orange prohibit you from  
22 taking any time off to take your mother  
23 to the eye doctor?

24 A. No.

25 Q. And for the days that you took

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1 P. HARAN

2 off or half days that you took off as  
3 well to take your mom to the eye doctor,  
4 did you use PTO for that?

5 A. Yes.

6 Q. So you were paid for those  
7 days off?

8 A. Yes.

9 MR. GUILFOYLE: I'm going to  
10 show you what will be marked as Haran 13.

11 (Whereupon, Bates OBS575 - 576 was  
12 marked as Exhibit 13 for identification,  
13 as of April 26th, 2023.)

14 MR. GUILFOYLE: And for the  
15 record, it's Bates OBS575 to 576.

16 Q. I ask that you take a moment  
17 and review that document and let me know  
18 when you've had the opportunity to do  
19 so?

20 A. Okay.

21 Q. Do you recognize that  
22 document?

23 A. It looks like a Teams exchange  
24 between Adam and I.

25 Q. It appears to be on

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1 P. HARAN

2 October 8th of 2020?

3 A. Mh-hm.

4 Q. Okay. And you also have a  
5 claim of FMLA retaliation in this case;  
6 how do you contend that Orange  
7 retaliated against you in violation of  
8 the FMLA?

9 A. By firing me.

10 Q. Okay. Is that all the ways  
11 that you believe Orange retaliated  
12 against you in violation of the FMLA?

13 A. Yes.

14 Q. Did you ever take FMLA leave  
15 while at Orange?

16 A. No.

17 Q. Did you ever request FMLA  
18 leave while employed at Orange --

19 A. No.

20 Q. -- so if we turn back to  
21 Exhibit 7, your Interrogatory Responses

22 --

23 A. Okay.

24 Q. -- so Number 15 there.

25 A. Fifteen?

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2 Q. Correct.

3 A. The person --

4 Q. Interrogatory Number 15.

5 There's no page numbers it's a little  
6 difficult I appreciate that.

7 A. Number 15 --

8 Q. Do you see that this  
9 interrogatory asks you identify each day  
10 off work you took to take your daughter  
11 to doctor's appointments and for  
12 treatment as alleged in the Paragraph 19  
13 of the complaint. Do you see that?

14 A. Yes.

15 Q. Do you see your response that  
16 identifies October 14th half day,  
17 October 15th through the 19th --

18 A. Mh-hm.

19 Q. November 11, December 18,  
20 December 28th, December 30, and  
21 February 12th; do you see that?

22 A. Yes.

23 Q. Okay. Is that answer  
24 accurate?

25 A. I believe so; yeah, to the

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1 P. HARAN

2 best of my knowledge.

3 Q. If you turn to response  
4 Interrogatory Number 8 within this  
5 document.

6 And this interrogatory asks  
7 you to identify each employee, agent or  
8 representative of defendant who you  
9 purport subjected you to discrimination  
10 or retaliation; do you see that?

11 A. Mh-hm, yes.

12 Q. And you identified Adam  
13 Kimmick and Eddy Youhanna (sic), which I  
14 believe should be Youkhanna; is that  
15 correct?

16 A. Yes.

17 Q. Okay. Is that answer  
18 accurate?

19 A. Yes.

20 Q. Okay. You also have a claim  
21 for discrimination under the New York  
22 City Human Rights Law; how do you  
23 contend that Orange discriminated  
24 against you in violation of the New York  
25 City Human Rights Law?

1 P. HARAN

2 A. So, my lawyer filed, you know,  
3 the details. You know, in summary  
4 it's -- it's because of being a  
5 caregiver to my mother and my daughter,  
6 then needing to have accommodation to  
7 take care of them. And I believe that  
8 that -- that's -- the contention is the  
9 fact that I was terminated in  
10 retaliation for taking that time off.  
11 It's related to that New York State law  
12 that you're referring to.

13 Q. That claim is only for  
14 discrimination and not retaliation; are  
15 you aware of that?

16 A. Okay.

17 Q. And you mentioned an  
18 accommodation; did you ever request an  
19 accommodation from Orange?

20 A. So, I didn't. No, I didn't.

21 Q. And when you were hired by  
22 Orange, you were already a mother of two  
23 children, correct?

24 A. Yes.

25 Q. At the time you were hired by

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2 Orange, you were also a daughter to your  
3 mother, correct?

4 A. Yes.

5 Q. Other than what you just  
6 mentioned, are you there any other ways  
7 you believe that Orange discriminated  
8 against you based upon your status as a  
9 mother?

10 A. No.

11 Q. If you could go back to  
12 Exhibit 7, the Interrogatory Responses,  
13 specifically Interrogatory Number 8?

14 A. Okay.

15 Q. And do you see that this  
16 interrogatory asked you to identify each  
17 employee, agent, representative of  
18 defendant who you purport subjected you  
19 to discrimination or retaliation; do you  
20 see that?

21 A. Yes.

22 Q. You identified Mr. Kimmick and  
23 Mr. Youkhanna?

24 A. Yes.

25 Q. Is that answer accurate and

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1 P. HARAN

2 complete?

3 A. Yes.

4 Q. If you could turn to the next  
5 page, Interrogatory Number 9. It asks  
6 to you identify each and every  
7 discriminatory and/or retaliatory  
8 comment, behavior or action that you  
9 contend defendant or defendant's agents,  
10 representatives and/or employees made  
11 two or concerning you; do you see that?

12 A. Yes.

13 Q. And do you see your response  
14 below?

15 A. Yes.

16 Q. Okay. And is your response --  
17 your response to this interrogatory  
18 accurate?

19 A. Yes.

20 Q. Is this response complete?

21 A. Yes.

22 Q. Did anyone at Orange ever make  
23 any negative comments about your  
24 daughter's illness?

25 A. Can you explain what you mean

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1 P. HARAN

2 by negative comments?

3 Q. Did anyone at Orange make any  
4 disparaging comments about your  
5 daughter's illness?

6 A. No.

7 Q. Did anyone at Orange ever make  
8 any negative or disparaging comments  
9 about you taking days off in connection  
10 with your daughter's illness?

11 A. Not specifically about taking  
12 days off. It was about the lack of  
13 focus.

14 Q. Move to strike.

15 My question was did anyone at  
16 Orange ever make any negative or  
17 disparaging comments about you taking  
18 days off --

19 A. No.

20 Q. -- in connection with --  
21 okay.

22 Did anyone at Orange ever make  
23 any negative or disparaging comments  
24 about your mother's illness?

25 A. No.

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2 Q. Did anyone at Orange ever make  
3 any negative or disparaging comments  
4 about you taking days off in connection  
5 with your mother's illness?

6 A. No.

7 Q. During your employment with  
8 Orange, did you ever report  
9 discrimination or retaliation to anyone  
10 at Orange?

11 A. No.

12 Q. Why not?

13 A. I was afraid that I would  
14 ruffle feathers if I went and took up my  
15 request to human resources, or to higher  
16 up the leadership chain. I just thought  
17 that it was -- I was already feeling --  
18 yeah, so I -- I was afraid to.

19 Q. And you're aware that as part  
20 of this lawsuit you're seeking damages  
21 in this case?

22 A. Yes.

23 Q. And are you aware of what  
24 damages you're seeking here?

25 A. Yes.

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1 C E R T I F I C A T E

2 I, AMBRIA IANAZZI, a Registered  
3 Professional Reporter, Certified Realtime  
4 Reporter, New York Association Certified Reporter,  
5 New York Realtime Certified Reporter, Certified  
6 Shorthand Reporter and Notary Public in New York  
7 do hereby certify:

8 That PATRICIA HARAN whose  
9 examination is hereinbefore set forth, was duly  
10 sworn, and that such examination is a true record  
11 of the testimony given by PATRICIA HARAN.

12 I further certify that I am not  
13 related to any of the parties to this action by  
14 blood or marriage; and that I am in no way  
15 interested in the outcome of this matter.

16

17 In witness whereof, I have hereunto set  
18 my hand this 2nd day of May, 2023.

19

20

*Ambria Ianazzi*

21

22

AMBRIA IANAZZI, RPR, CRR, CSR

23

24

25

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